

From: [Nicholas Peterson](#)
To: [Matt Batezel](#); [Daniel Balmat](#)
Cc: [Dylan Schaffer](#); [Edward Kerley](#)
Subject: Tong v. State Farm - Draft Stipulation & Protective Order
Date: Wednesday, August 21, 2024 5:25:02 PM
Attachments: [STIPULATED PROTECTIVE ORDER \(Draft\) Tong v SF..doc.docx](#)

Hello Matt and Dan,

With State Farm's discovery responses and accompanying document production(s) set to arrive soon, I thought to send over a draft stip and protective order, so we can get that on file and signed by the court beforehand to speed things along.

Also, to be clear, our preference is to not have one at all, but should State Farm disagree, attached is the model version from the Central District, which I've left unchanged (except for the caption page).

There are three sections that need some editing per the Court's instructions (namely, 1.B., 2.1. and 4.). Let us know if you prefer we handle those edits. Otherwise, if you prefer to do it, please track changes so I can follow along.

Thank you and let me know if you have any questions,

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